

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

ELEANOR McCULLEN, JEAN)	
BLACKBURN ZARRELLA,)	
GREGORY A. SMITH, CARMEL)	
FARRELL, and ERIC CADIN,)	
)	Civil Action No. _____
Plaintiffs,)	
)	
v.)	
)	
MARTHA COAKLEY, Attorney)	
General for the COMMONWEALTH OF)	
MASSACHUSETTS,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION TO ENLARGE PAGE LIMIT IN
MEMORANDUM OF LAW IN SUPPORT OF PRELIMINARY INJUNCTION**

Plaintiffs, by and through counsel, pursuant to Local Rule 7.1(b)(4), hereby move the Court for an order allowing an enlargement of pages for their memorandum of law in support of their motion for preliminary injunction. As grounds, Plaintiffs show the Court the following:

1. Local Rule 7.1(b)(4) limits to twenty (20) the number of pages that may be included in a memorandum of law in support of any motion.
2. This case presents facial and as applied challenges to the constitutionality of a buffer zone law of unprecedented scope that severely burdens rights guaranteed by the First and Fourteenth Amendments to the United States Constitution.
3. Plaintiffs' memorandum of law in support of their motion for preliminary injunction is fifty-four (54) pages.

4. The additional pages are necessary to provide the Court with a thorough presentation of binding case law relevant to the issues presented.

WHEREFORE, Plaintiffs request that their motion to enlarge pages be granted.

Respectfully submitted,

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